

REMARKS

Applicants submit these Remarks in reply to the Office Action mailed December 27, 2007. Following this Amendment, claims 1-45 remain pending in this application, of which claims 1, 16, and 31 are independent.

In the Office Action, the Examiner took the following actions:

- i. rejected claims 12, 27, and 42 under 35 U.S.C. § 112; and
- ii. rejected claims 1-45 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,901,214 ("*Shaffer*").

With this Reply, Applicants have amended independent claim 1 to recite the following:

A method for providing an alternative delivery point code, the method comprising:

receiving delivery data corresponding to a delivery point;

determining if the delivery data includes a secondary element; and

calculating the alternative delivery point code based upon the secondary element if the delivery data includes the secondary element.

Applicants have made similar amendments to independent claims 16 and 31 and dependent claims 5, 20, and 35. These amendments find support at least at original claims 9, 11, and 24-26; and paragraphs 022, 037, and 039-047 of the Specification. In addition, Applicants have amended claims 12, 27, and 42 to address the Examiner's rejections under § 112. These amendments introduce no new matter.

Applicants respectfully traverse all pending rejections, as follows.

I. Claim Rejections Under 35 U.S.C. § 112

In the Office Action, the Examiner rejected claims 12, 27, and 42, under 35 U.S.C. § 112, alleging an insufficient antecedent basis for the recitation “the random prime number.” (Office Action at ¶ 2.) To address this rejection, Applicants have amended claims 12, 27, and 42 to depend instead from claims 10, 25, and 40, respectively. Each of these independent claims recites “a random prime number” and, as such, provides antecedent basis for “the random prime number,” as recited in the dependent claims. For this reason, Applicants respectfully request that the Examiner withdraw the § 112 rejection and reconsider the claims, accordingly.

II. Claim Rejections Under 35 U.S.C. § 102(b)

Applicants respectfully traverse the rejection of claims 1-45 under 35 U.S.C. § 102(b) as being anticipated by *Shaffer*. To establish anticipation under § 102(b), the Examiner must show that *Shaffer* discloses each and every element of the Applicants’ claims, either expressly or inherently. See *In re Robertson*, 169 F.3d 743, 745 (Fed. Cir. 1999). Furthermore, the identical disclosure “must be shown in as complete detail as is contained in the ... claim.” See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Applicants respectfully submit that *Shaffer* fails to disclose every feature of Applicants’ claims. Amended independent claim 1 recites, among other things, “calculating the alternative delivery point code based upon the secondary element if the delivery data includes the secondary element.”

In contrast, *Shaffer* discloses “creating a unique housing or business unit identifier” by “appending the USPS secondary address” to ZIP+6 Code. (Col. 11, lines 34-40.) In more detail, *Shaffer* explains that “the USPS secondary address is stored as an eight character field . . . in the USPS Address management System (AMS).” Further, “appending this secondary address to the end of the DPC [(Delivery Point Code)] results in an extended 19 digit USPS ZIP Code, thereby creating a unique housing unit or business unit identifier.” (Col. 11, lines 40-44.) Accordingly, *Shaffer* merely describes obtaining a stored value (the secondary address) and appending it to the existing Zip Code. *Shaffer* does not hint, however, performing any calculation in order to arrive at the described extended ZIP Code. Thus, *Shaffer* does not teach “calculating the alternative delivery point code based upon the secondary element,” as recited in independent claim 1.

Moreover, claims 16 and 31, though they differ in scope from claim 1, contain similar recitations to those discussed above. Thus, claims 16 and 31 are patentably distinguishable over *Shaffer* for the same reasons. Furthermore, claims 2-15, 17-30, and 32-45, depend from claims 1, 16, and 31 and therefore necessarily include the recitations of their respective independent claims. Thus, *Shaffer* also does not teach or suggest every limitation of dependent claims 2-15, 17-30, and 32-45. Accordingly, Applicants respectfully request that the Examiner withdraw the rejections under 35 U.S.C. § 102(b) against pending claims 1-45 and reconsider such claims.

CONCLUSION

In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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